

1 DEVERIE J. CHRISTENSEN, ESQ.  
Nevada State Bar No. 6596  
2 THOMAS W. MARONEY, ESQ.  
Nevada State Bar No. 13913  
3 **JACKSON LEWIS P.C.**  
300 S. Fourth St., Suite 900  
4 Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
5 Email: [deverie.christensen@jacksonlewis.com](mailto:deverie.christensen@jacksonlewis.com)  
Email: [thomas.maroney@jacksonlewis.com](mailto:thomas.maroney@jacksonlewis.com)

6 *Attorneys for Defendant*  
7 *GTI Nevada, LLC d/b/a Rise*  
8 *Carson City*

9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 CELIA BERNA,

13 Plaintiff,

14 vs.

15 GTI NEVADA, LLC D/B/A RISE CARSON  
16 CITY,

Defendant.

Case No. 3:25-cv-00229-ART-CLB

**ORDER GRANTING STIPULATION TO  
EXTEND DEADLINE FOR DEFENDANT  
TO RESPOND TO PLAINTIFF'S  
COMPLAINT  
(SECOND REQUEST)**

17 IT IS HEREBY STIPULATED by and between Plaintiff Celia Berna ("Plaintiff"), by and  
18 through her counsel, Mark Mausert Law, and Defendant, GTI Nevada, LLC d/b/a Rise Carson  
19 City ("Defendant"), by and through its counsel, the law firm of Jackson Lewis P.C., that  
20 Defendant shall have a 2-week extension up to and including **July 16, 2025**, in which to file its  
21 response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

22 1. Defendant was served with the Summons and Complaint on May 12, 2025, (ECF  
23 No. 1) making Defendant's response to Plaintiff's Complaint due on June 2, 2025.

24 2. On May 28, 2025 the parties agreed to extend the deadline for Defendant to file its  
25 response to Plaintiff's Complaint to July 2, 2025 (ECF No. 7) to allow Defendant additional time  
26 to address the allegations within the Complaint.

27 3. Defendant is still in the process of investigating Plaintiff's allegations which  
28

1 include significant monetary damages, including, punitive damages.

2 4. The Parties have agreed to a second extension for Defendant to file its response to  
3 Plaintiff's Complaint to July 16, 2025, to allow Defendant additional time to address the  
4 allegations within the Complaint.

5 5. This is the second stipulation to extend the time for Defendant to respond to  
6 Plaintiff's Complaint.

7 6. The Parties believe these circumstances constitute good cause for granting an  
8 extension. *See* Fed. R. Civ. P. 6(b)(1).

9 7. This Stipulation is made in good faith and not for the purpose of delay.

10 8. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair  
11 any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation  
12 and Order shall be construed as an admission of or consent to the merit or validity of any claim,  
13 defense, objection, or right by any party in this case.

14 Dated this 30th day of June, 2025.

15 MARK MAUSERT LAW

JACKSON LEWIS P.C.

16 /s/ Sean McDowell

/s/ Thomas W. Maroney

17 Mark Mausert, Bar # 2398  
18 Sean McDowell, Bar # 15962  
19 729 Evans Avenue  
20 Reno, NV 89512

Deverie J. Christensen, Bar # 6596  
Thomas W. Maroney, Bar # 13913  
300 S. Fourth St., Suite 900  
Las Vegas, Nevada 89101

21 *Attorneys for Plaintiff*  
22 *Celia Berna*

*Attorneys for Defendant GTI Nevada, LLC d/b/a*  
*Rise Carson City*

23 **ORDER**

24 IT IS SO ORDERED.

25   
26 United States Magistrate Judge

27 Dated: June 30, 2025  
28

4933-1045-6658, v. 1